



State of Rhode Island and Providence Plantations
Rhode Island Department of Human Services
Office of the Director

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Bonnie Brathwaite, Director
Food and Nutrition Service, USDA
Northeast Region
10 Causeway Street, Room 501
Boston, MA 02222

Dear Ms. Brathwaite,

I am writing in response to your formal warning update letter dated October 3, 2019. Please see the following updates relating to the areas identified in the letter:

Timeliness

As you may be aware, DHS has made significant progress with improving its application timeliness rate. Last week, the ACLU dropped its lawsuit against the State relating to timely processing of benefits due to DHS achieving the benchmark of 11/12 months of 96% timeliness (utilizing the ACLU timeliness standard). As of today's date, the Court has ordered the termination of the Special Master's service and has terminated the Court's jurisdiction in this matter.

Please see the attached spreadsheet with the requested timeliness data from January to June 2019 for each month using the methodology outlined in the FNS Timeliness Data Protocol. It also displays the expedited rate, non-expedited rate and combined rate for each month along with the numerator and denominator used for each calculation. In addition, any applications that were excluded from the calculations are noted with explanation.

Backlog Elimination

DHS continues to work through the backlog of interim reports and recertifications. The State believes that all SNAP overdue recertifications and interim reports have been completed. DHS will continue working to ensure that our ongoing reporting accurately reflects the current status of these cases.

Delayed Implementation of Interfaces

As stated in the letter, no action is needed in this area at this time as FNS will review the existing interfaces during regularly scheduled management evaluations.

Able Bodied Adults Without Dependents (ABAWDs)

As recommended in the letter, no action is needed in this area at this time as FNS will review the existing interfaces during regularly scheduled management evaluations.

Electronic Benefit Transfer (EBT) Reconciliation

As stated in the letter, FNS continues to work with DHS on this topic. During a recent DHS/FNS meeting regarding EBT reconciliation, it was identified that the primary issue causing reconciliation discrepancies was related to how the daily EBT issuance file is sent and received by the EBT vendor, FIS. DHS, Deloitte and FIS are working together to develop an improved process to verify that every transaction is received and processed. Additional processes will be implemented to

ensure that the system vendor performs its own reconciliation process to make related updates to the eligibility system when corrections occur within the FIS system. FNS and DHS agreed to ongoing monthly technical assistance meetings to bring the agency into compliance with the EBT reconciliation requirements. We look forward to our continued partnership in this area.

Quality Control

The DHS QC Unit continues to be timely with its monthly submissions. To address any QC errors, DHS has implemented a quality improvement initiative. This initiative enhances the Supervisory process and includes weekly case reviews, routine supervisory feedback sessions and a staff skill and competency development process with the Center for Staff Development and Learning. In addition, DHS continues to address any system-related issues during weekly theme meetings with Deloitte, and operational issues during weekly internal operations meetings. DHS has also recently initiated regular meetings between SNAP Program staff, Corrective Action and Deloitte to analyze current error trends and determine system-related enhancements that can help prevent errors going forward.

Reporting

As of this date, DHS has submitted all outstanding historical reports. The final FNS-366B report for the 4th quarter of FFY 2019 has been submitted and posted, and DHS is now up-to-date with all report submissions. DHS revised the logic for line 7b on the FNS-46 to correct a small discrepancy and will resubmit the impacted historical reports. DHS will work with its EBT and system vendors to address the small discrepancies identified in the issuance amounts. During a meeting on October 21, 2019, FNS has agreed to DHS's current logic for Line 10 of the FNS-46 report and no revisions are necessary at this time. FNS has agreed to provide guidance on reporting of investigator benefits on the FNS-388 report.

Claims, Collection and Recovery Unit (CCRU)

As requested, DHS will submit a final version of the CCRU organizational chart once its completed.

CCRU staffing remains stable. The unit is currently fully staffed, with the exception of the Supervising ET who is on temporary leave. We are in the process of exploring a three-day rule for this position to have coverage until the Supervisor's anticipated return. The unit has also recently been assigned a Senior Casework Supervisor to oversee and support the unit.

DHS is working toward completing the transition of the unit to Financial Management. As previously highlighted, this structure is supported by additional program and operational administrative staff.

The DHS Center for Staff Development and Learning has developed a training curriculum for the eligibility and operational supervisory staff. This training will be piloted within the next few weeks.

In closing, I appreciate the opportunity to provide the FNS team with this update. Please let me know if you need further information or explanation about anything contained in this response.

Thank you,



Courtney E. Hawkins
Director, RI Department of Human Services
Enclosure

